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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

## SAN JOSE DIVISION

**IN RE: HIGH-TECH EMPLOYEE  
ANTITRUST LITIGATION**

Master Docket No. 11-CV-2509-LHK

**THIS DOCUMENT RELATES TO:  
ALL ACTIONS**

**INTEL'S OBJECTIONS AND RESPONSES  
TO PLAINTIFFS' FIRST SET OF  
INTERROGATORIES RE:  
IDENTIFICATION OF WITNESSES**

**PROPOUNDING PARTY:** Siddharth Hariharan, Brandon Marshall, Michael Devine, Mark Fichtner, and Daniel Stover

**RESPONDING PARTY:** Intel Corporation

One

Master Docket No. 11-CV-2509-LHK

1 Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, defendant Intel  
 2 Corporation (“Intel”) responds and objects to plaintiffs Siddharth Hariharan, Brandon Marshall,  
 3 Michael Devine, Mark Fichtner, and Daniel Stover’s First Set of Interrogatories Re:  
 4 Identification of Witnesses as follows:

5 **GENERAL OBJECTIONS AND RESPONSES**

6 1. Intel has not completed its investigation of the facts relating to this action, and has  
 7 not completed discovery or trial preparation in this action. Therefore, Intel’s responses are based  
 8 on Intel’s knowledge, information and belief at this time. The responses below are made in a  
 9 good faith effort to supply as much information as is presently known, but shall not in any way  
 10 prejudice Intel in relation to further discovery, research, or analysis. Intel reserves the right to  
 11 rely, at the time of trial or in other proceedings in this action, upon responses and evidence  
 12 beyond the responses provided herein.

13 2. Intel objects to the interrogatories insofar as they seek to require the production of  
 14 information (i) prepared by or for attorneys for or in anticipation of litigation; (ii) that constitutes  
 15 attorney-client privileged material; (iii) that constitutes attorney work product; (iv) subject to the  
 16 common interest or joint defense privilege; (v) subject to any other privilege, protection or  
 17 immunity; or, (vi) that is otherwise protected from disclosure. The inadvertent production of any  
 18 privileged or protected information shall not be deemed to be a waiver of any applicable  
 19 privilege or protection with respect to such information or any other information provided by  
 20 Intel.

21 3. Intel objects to the interrogatories to the extent that they seek information the  
 22 disclosure of which is prohibited by federal and/or state law, including but not limited to  
 23 applicable California state laws, the California Constitution, art. 1, sec. 1, and any other  
 24 applicable law, rule, regulation or any confidentiality commitment or agreement provided to any  
 25 customer.

26 4. Intel objects to the interrogatories, including the Instructions thereto, to the extent  
 27 that they seek to impose obligations and duties beyond those required under Federal Rules of  
 28 Civil Procedure or Local Rules of the Northern District of California.

1           5. Intel objects to each and every interrogatory to the extent it seeks “all” persons or  
 2 employees who possess responsive information on the basis that such interrogatory is overly  
 3 broad, unduly burdensome, oppressive, and not relevant to the claim or defense of any party to  
 4 this action.

5           6. Intel further objects to these Interrogatories to the extent they seek information  
 6 regarding Intel’s employees and/or applicants for Intel positions located outside of the United  
 7 States as overbroad, unduly burdensome and outside the scope of information reasonably  
 8 calculated to lead to the discovery of admissible evidence.

9           7. Intel objects to interrogatories, including but not limited to definition 2, on the  
 10 ground that the definition of “Agreement” is vague and ambiguous, and assumes facts not in  
 11 evidence. For purposes of its response, to avoid disputes and provide plaintiffs with relevant  
 12 information, Intel will interpret that definition to include unilateral policies. By responding to  
 13 Interrogatories using the term “Agreement,” Intel does not concede the existence of bilateral  
 14 agreements alleged in Plaintiffs’ Complaint.

15           8. Intel objects to instruction 1 on the ground that the phrase “the years about which  
 16 the person has the knowledge identified by the interrogatory” is vague, ambiguous, and  
 17 unintelligible.

18           9. Intel objects to the interrogatories, including but not limited to instruction 3  
 19 (procedure for withholding information for privilege) to the extent they purport to impose upon  
 20 Intel burdens different than and inconsistent with the proposed e-discovery stipulation that is  
 21 currently being negotiated between Intel and plaintiffs, and/or beyond applicable legal  
 22 requirements.

23           10. Intel objects to the interrogatories, including but not limited to instructions 1 and  
 24 4 (relevant time period) to the extent that they seek information for the “relevant time period” of  
 25 January 1, 2003 through the present, as unduly burdensome and not reasonably calculated to lead  
 26 to the discovery of admissible evidence. Intel will respond for the time period from January 1,  
 27 2004, to the present.

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1           11. Intel objects to the interrogatories, including the Instructions thereto, to the extent  
2 that they seek information that would be of little or no relevance to the issues raised in the  
3 Consolidated Amended Complaint (“Complaint”) and/or are overbroad and would subject Intel  
4 to unreasonable, oppressive or undue burden and expense.

5           12. Intel expressly reserves all objections as to relevance, authenticity or admissibility  
6 of any responses.

7           13. Intel objects to the interrogatories to the extent that they purport to require Intel to  
8 provide information that is not currently within Intel’s possession, custody or control.

9           14. Intel objects to the interrogatories to the extent that they purport to require Intel to  
10 provide information that is already in the possession, custody or control of plaintiffs or plaintiffs’  
11 counsel, or is otherwise equally accessible to plaintiffs or plaintiffs’ counsel as it is to Intel.

12          15. Intel reserves all objections and reserves the right to supplement or clarify these  
13 responses and objections at any time.

14          16. Intel objects to the interrogatories to the extent that they call for speculation and  
15 conjecture, opinion or legal conclusion.

16          17. Counsel for Intel will be prepared to discuss the objections herein with plaintiffs’  
17 counsel for the purpose of resolving any disputes that may arise without any need for  
18 intervention by the Court.

### **OBJECTIONS TO THE DEFINITIONS**

20          1. Intel objects to the definition of “Agreement” in paragraph 2 of the definitions as  
21 argumentative, vague, ambiguous, overbroad, and assuming facts not in evidence. Intel also  
22 objects to the definition to the extent it seeks to impose obligations and duties beyond those  
23 required under the Federal Rules of Civil Procedure and the Local Rules of the Northern District  
24 of California.

25          2. Intel objects to the definition of “Co-Conspirators” in paragraph 6 of the  
26 definitions as argumentative, vague, ambiguous, overbroad, unduly burdensome, and assuming  
27 facts not in evidence. Intel interprets that term to mean “defendants.”

1           3. Intel objects to the definition of “Employee” in paragraph 8 of the definitions as  
2 overly broad, in particular to the extent it purports to include “agents,” “messengers” and  
3 “directors.”

4           4. Intel objects to the definitions of “Subsidiary,” “affiliate,” and “joint venture” in  
5 paragraph 13 of the definitions, and “You,” “your,” and “your company” in paragraph 14 of the  
6 definitions as overbroad, unduly burdensome, and neither relevant to the claims or defenses of  
7 any party nor reasonably calculated to lead to the discovery of admissible evidence. In  
8 particular, Intel objects to the inclusion in these definitions of “any entity or person in which you  
9 have any financial ownership or interest,” and “predecessors, successors, subsidiaries . . .  
10 affiliates and/or agents (including, without limitation, any third-party recruiting, hiring, or  
11 headhunting firm), together with all present and former directors, officers, employees, agents,  
12 representatives, or any persons acting or purporting to act on behalf of you,” as most of the  
13 named persons or entities are not the subject of this litigation. Intel further objects to these  
14 definitions to the extent they seek information which is not in the possession, custody or control  
15 of Intel. Intel also objects to the definitions to the extent they purport to impute to Intel any  
16 knowledge of persons or entities falling within the scope of the terms “Subsidiary,” “affiliate,”  
17 “joint venture,” “You,” “your,” or “your company” as plaintiffs defined them, or impose duties  
18 to ascertain the identity, existence or relationships of or among any of the persons or entities  
19 listed or defined. Intel responds to these interrogatories, and will produce responsive, non-  
20 privileged information, on behalf of Intel Corporation only.

21           5. Intel objects to the undefined term “competitor” as vague, ambiguous, overbroad,  
22 unduly burdensome, and not reasonably likely to lead to the discovery of admissible evidence.  
23 Intel interprets that term to mean “defendants.”

24           **SPECIFIC OBJECTIONS AND RESPONSES**

25           Intel incorporates all of the above General Objections and Responses into all of the  
26 Specific Objections and Responses as if fully set forth therein. Intel specifically objects and  
27 responds as follows:

28           **INTERROGATORY NO. 1:**

1           In order of corporate seniority, identify your employees who participated in decisions  
 2       regarding agreements or discussions about agreements.

3       **RESPONSE TO INTERROGATORY NO. 1:**

4           In addition to its General Objections, Intel objects to this interrogatory to the extent it  
 5       assumes the existence of “agreements” between Intel and any other defendant. Intel further  
 6       objects to the phrase “in order of corporate seniority,” to the extent that it is vague, ambiguous  
 7       and unintelligible, including because “corporate seniority” is not subject to precise ranking and  
 8       may change over time. Subject to and without waiving the foregoing objections, Intel responds  
 9       as follows:

10	Employee	Employer	State of Primary Residence	Job Titles (years)
11	Paul Otellini	Intel Corp.	CA	President (2002-Present) CEO (2005-Present)
12	Patricia Murray	Intel Corp.	CA	Senior Vice President, Director, Human Resources (2003-Present)
13	Deborah Conrad	Intel Corp.	CA	Joint Manager Solution Market Development Program (2000-2005) Apple Team Worldwide Manager (2005-2008) Corporate Vice President, Sales & Marketing and Chief Marketing Officer (2008-Present)
14	Patrick Gelsinger	EMC Corp.	OR	Chief Technology Officer (2000-2005) Senior Vice President & General Manger, Digital Enterprise Group (2005-2009)
15	Don Cooper	Intel Corp.	OR	Executive Search Senior Talent Acquisition Manager (2004-Present)

16       These individuals should be contacted through Intel counsel only.

17       **INTERROGATORY NO. 2:**

18           Of the persons identified in response to Interrogatory No. 1, identify all persons who have  
 19       substantial knowledge of corporate decisions regarding agreements or discussions about  
 20       agreements.

21       **RESPONSE TO INTERROGATORY NO. 2:**

22           In addition to its General Objections, Intel objects to this interrogatory to the extent it  
 23       assumes the existence of “agreements” between Intel and any other defendant. Intel also objects  
 24       to this interrogatory as vague, ambiguous and unintelligible based upon its use of the phrase

1 “substantial knowledge.” Subject to and without waiving the foregoing objections, Intel refers to  
 2 its response to Interrogatory No. 1.

3 **INTERROGATORY NO. 3:**

4 In order of corporate seniority, identify all your employees not identified in response to  
 5 Interrogatory Nos. 1 and 2 who have known about agreements or discussions about agreements.

6 **RESPONSE TO INTERROGATORY NO. 3:**

7 In addition to its General Objections, Intel objects to this interrogatory to the extent it  
 8 assumes the existence of “agreements” between Intel and any other defendant. Intel further  
 9 objects to the phrase “in order of corporate seniority,” to the extent that it is vague, ambiguous  
 10 and unintelligible, including because “corporate seniority” is not subject to precise ranking and  
 11 may change over time. Intel further objects to the phrase “known about,” to the extent that it  
 12 purports to include other than first-hand information and because it is overly burdensome to  
 13 identify every employee or former employee who may have “known about agreements or  
 14 discussions about agreements.” Subject to and without waiving the foregoing objections, Intel  
 15 responds as follows:

Employee	Employer	State of Primary Residence	Job Titles (years)
Renee James	Intel Corp.	OR	Director of Microsoft Program (2004) Vice President & General Manager Software Services Group (2005-2010) Senior Vice President/General Manager, Software and Services Group (2010-Present)
Diane Bryant	Intel Corp.	CA	Design Manager, Server Platform Group (2004-2005) Vice President & General Manager, Server Platform Group (2005-2008) Corporate Vice President, Chief Information Officer (2008-Present)
Justin Rattner	Intel Corp.	OR	Director of Microprocessor Research Lab (2000-2005) Corporate Vice President and Chief Technology Officer, Senior Fellow and Head of Intel Labs (2005-Present)

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1	Elliot Garbus	Intel Corp.	AZ	General Manager, Developer Relations Division (2005-2008) Vice President & General Manager, Digital Computing Software Division, Software and Services Group (2007-Present)
2	James Hurley	Intel Corp.	CA	Sr. Principal Engineer and Manager, Graphics Lab (2004-2008) Sr. Principal Engineer and Director, Visual Applications Research (2008-Present)
3	Gabrielle Thompson	Success-Factors	CA	Director, Worldwide Compensation and Benefits (2004-2007) Director of Global Staffing Operations (2007)
4	Larry Walz	Unknown	UT	Director of Staffing/Staffing Manager (2004-2010)
5	Paresh Pattani	Intel Corp.	OR	Director, HPC & WS Applications (2000-Present)
6	Tina Evangelista	Intel Corp.	AZ	Global Staffing Business Manager (2004-2006) Global Staffing Manager (2006-2007) M&A Global Program Manager (2007-2008) Global Staffing Controls and Compliance Manager (2008-Present)
7	Cindi Harper	Intel Corp.	AZ	Staffing Manager/HR Manager (1996-Present)
8	Paul Sathis	Intel Corp.	CA	Director, Strategic Partner Engagement-Intel Hybrid Cloud (1994-Present)
9	Ranna Prajapati	Intel Corp	CA	Business Development Manager (2005-Present)
10	Christina Dickenson	Intel Corp.	OR	Staffing Operations Manager (2000-2006) March Strategic Sourcing Manager (2006-2009) U.S. College Manager (2009-Present)
11	Gwen Hyder	Intel Corp.	NM	Staffing Consultant (Contract) (2005) Project Manager/HR Business Manager (2008-Present)
12	Jeanine Hughes	Intel Corp.	OR	Sr. Recruiter (2007-Present)

23 These individuals should be contacted through Intel counsel only.

24 **INTERROGATORY NO. 4:**

25 Of the persons identified in response to Interrogatory No. 3, identify those who have  
 26 substantial knowledge regarding corporate decisions relating to agreements or discussions about  
 27 agreements.

28 **RESPONSE TO INTERROGATORY NO. 4:**

Master Docket No. 11-CV-2509-LHK

1        In addition to its General Objections, Intel objects to this interrogatory to the extent it  
2    assumes the existence of “agreements” between Intel and any other defendant. Intel further  
3    objects to this request as vague, ambiguous and unintelligible based upon its use of the phrases  
4    “substantial knowledge” and “corporate decisions relating to agreements or discussions about  
5    agreements.” Subject to and without waiving the foregoing objections, Intel refers to its  
6    response to Interrogatory No. 3.

7    **INTERROGATORY NO. 5:**

8        Identify your executives, employees, or agents who participated in multilateral meetings  
9    or communications with competitors in which agreements or discussions about agreements  
10   occurred.

11   **RESPONSE TO INTERROGATORY NO. 5:**

12       In addition to its General Objections, Intel objects to this interrogatory to the extent it  
13   assumes the existence of “agreements” between Intel and any other defendant. Subject to and  
14   without waiving the foregoing objections, Intel is not aware of any such executives, employees,  
15   or agents.

16   **INTERROGATORY NO. 6:**

17       Of the persons identified in response to Interrogatory No. 5 above, identify those who  
18   have substantial knowledge regarding the substance of the agreements or discussions about  
19   agreements.

20   **RESPONSE TO INTERROGATORY NO. 6:**

21       In addition to its General Objections, Intel objects to this interrogatory to the extent it  
22   assumes the existence of “agreements” between Intel and any other defendant. Subject to and  
23   without waiving the foregoing objections, Intel is not aware of any individuals responsive to this  
24   interrogatory.

25   **INTERROGATORY NO. 7:**

26       Identify your executives, employees, or agents who participated in bilateral meetings or  
27   communications with competitors about agreements.

28   **RESPONSE TO INTERROGATORY NO. 7:**

1           In addition to its General Objections, Intel objects to this interrogatory to the extent it  
 2 assumes the existence of “agreements” between Intel and any other defendant. Subject to and  
 3 without waiving the foregoing objections, Intel responds as follows:

4	Employee	Employer	State of Primary Residence	Job Titles (years)
5	Deborah Conrad	Intel Corp.	CA	Joint Manager Solution Market Development Program (2000-2005) Apple Team Worldwide Manager (2005-2008) Corporate Vice President, Sales & Marketing and Chief Marketing Officer (2008-Present)
6	Don Cooper	Intel Corp.	OR	Executive Search Senior Talent Acquisition Manager (2004-Present)
7	Patrick Gelsinger	EMC Corp.	OR	Chief Technology Officer (2000-2005) Senior Vice President & General Manger, Digital Enterprise Group (2005-2009)
8	Patricia Murray	Intel Corp.	CA	Senior Vice President, Director, Human Resources (2003-Present)
9	Paul Otellini	Intel Corp.	CA	President (2002-Present) CEO (2005-Present)
10	Paresh Pattani	Intel Corp.	OR	Director, HPC & WS Applications (2000-Present)
11	Ranna Prajapati	Intel Corp.	CA	Business Development Manager (2005-Present)
12	Paul Sathis	Intel Corp.	CA	Director, Strategic Partner Engagement-Intel Hybrid Cloud (1994-Present)

13       These individuals should be contacted through Intel counsel only.

14       **INTERROGATORY NO. 8:**

15           Of the persons identified in response to Interrogatory No. 7 above, identify those who  
 16 have substantial knowledge regarding the substance of the bilateral meetings and  
 17 communications with competitors.

18       **RESPONSE TO INTERROGATORY NO. 8:**

19           In addition to its General Objections, Intel objects to this interrogatory to the extent it  
 20 assumes the existence of “agreements” between Intel and any other defendant. Intel also objects  
 21 to this interrogatory as vague, ambiguous and unintelligible based upon its use of the phrase  
 22 “substantial knowledge.” Intel further objects to this interrogatory as overbroad, unduly  
 23 burdensome, and oppressive based upon its use of the phrase “bilateral meetings and  
 24 communications with competitors,” which Intel interprets to mean “bilateral meetings and  
 25 A/74751719.5/2014763-0000355568

1 communications with competitors about alleged agreements.” Subject to and without waiving  
 2 the foregoing objections, Intel refers to its response to Interrogatory No. 7.

3 **INTERROGATORY NO. 9:**

4 Identify your employees who were involved in implementing, policing, or enforcing the  
 5 discussions or agreements, or who have substantial knowledge of the implementation, policing,  
 6 or enforcement of agreements or discussions.

7 **RESPONSE TO INTERROGATORY NO. 9:**

8 In addition to its General Objections, Intel objects to this interrogatory to the extent it  
 9 assumes the existence of “agreements” between Intel and any other defendant. Intel further  
 10 objects to this interrogatory as vague, ambiguous and unintelligible based upon its use of the  
 11 phrases “substantial knowledge” and the undefined terms “involved,” “implementing,”  
 12 “enforcing,” “implementation,” “policing,” and “enforcement.” Subject to and without waiving  
 13 the foregoing objections, Intel responds as follows:

Employee	Employer	State of Primary Residence	Job Titles (years)
Diane Bryant	Intel Corp.	CA	Design Manager, Server Platform Group (2004-2005) Vice President & General Manager, Server Platform Group (2005-2008) Corporate Vice President, Chief Information Officer (2008-Present)
Deborah Conrad	Intel Corp.	CA	Joint Manager Solution Market Development Program (2000-2005) Apple Team Worldwide Manager (2005-2008) Corporate Vice President, Sales & Marketing and Chief Marketing Officer (2008-Present)
Don Cooper	Intel Corp.	OR	Executive Search Senior Talent Acquisition Manager (2004-Present)
Christina Dickenson	Intel Corp.	OR	Staffing Operations Manager (2000-2006) March Strategic Sourcing Manager (2006-2009) U.S. College Manager (2009-Present)

1	Tina Evangelista	Intel Corp.	AZ	Global Staffing Business Manager (2004-2006) Global Staffing Manager (2006-2007) M&A Global Program Manager (2007-2008) Global Staffing Controls and Compliance Manager (2008-Present)
2	Patrick Gelsinger	EMC Corp.	OR	Chief Technology Officer (2000-2005) Senior Vice President & General Manger, Digital Enterprise Group (2005-2009)
3	Cindi Harper	Intel Corp.	AZ	Staffing Manager/HR Manager (1996-Present)
4	Gwen Hyder	Intel Corp.	NM	Staffing Consultant (Contract) (2005) Project Manager/HR Business Manager (2008-Present)
5	Renee James	Intel Corp.	OR	Director of Microsoft Program (2004) Vice President & General Manager Software Services Group (2005-2010) Senior Vice President/General Manager, Software and Services Group (2010-Present)
6	Patricia Murray	Intel Corp.	CA	Senior Vice President, Director, Human Resources (2003-Present)
7	Paul Otellini	Intel Corp.	CA	President (2002-Present) CEO (2005-Present)
8	Larry Walz	Unknown	UT	Director of Staffing/Staffing Manager (2004-2010)

16 These individuals should be contacted through Intel counsel only.

17 **INTERROGATORY NO. 10:**

18 Of the persons identified in response to Interrogatory No. 9 above, identify those who  
19 have substantial knowledge regarding the implementation, policing, or enforcement of the  
20 agreements or discussions.

21 **RESPONSE TO INTERROGATORY NO. 10:**

22 In addition to its General Objections, Intel objects to this interrogatory to the extent it  
23 assumes the existence of “agreements” between Intel and any other defendant. Intel further  
24 objects to this interrogatory as vague, ambiguous and unintelligible based upon its use of the  
25 phrases “substantial knowledge” and the undefined terms “involved,” “implementing,”  
26 “enforcing,” “implementation,” “policing,” and “enforcement.” Subject to and without waiving  
27 the foregoing objections, Intel refers to its response to Interrogatory No. 9.

28 **INTERROGATORY NO. 11:**

1 Identify your employees who have knowledge of the effect(s) of the agreements on the  
2 compensation of your employees, or on the compensation of any Co-Conspirator's employees.

3 **RESPONSE TO INTERROGATORY NO. 11:**

4 In addition to its General Objections, Intel objects to this interrogatory to the extent it  
5 assumes the existence of "agreements" between Intel and any other defendant and that any such  
6 alleged agreement had an effect on the compensation of Intel employees or the compensation of  
7 any other Co-conspirator's employees. Intel also objects to this interrogatory as overbroad,  
8 unduly burdensome, and oppressive because the effects, if any, of the alleged "agreements"  
9 would differ for each affected employee, and therefore are beyond the scope of any individual's  
10 knowledge. Intel further objects to this interrogatory as premature to the extent that it is properly  
11 the subject of expert testimony. Subject to and without waiving the foregoing objections, Intel  
12 responds that certain employees identified in these responses have knowledge of the expected  
13 effects on compensation of the alleged conduct.

14 **INTERROGATORY NO. 12:**

15 Of those persons identified in response to Interrogatory No. 11 above, identify those  
16 employees having substantial knowledge of the effect(s) of the agreements or discussions about  
17 agreements on the compensation of your employees, or on the compensation of any Co-  
18 Conspirator's employees.

19 **RESPONSE TO INTERROGATORY NO. 12:**

20 In addition to its General Objections, Intel objects to this interrogatory to the extent it  
21 assumes the existence of "agreements" between Intel and any other defendant and that any such  
22 alleged agreement had an effect on the compensation of Intel employees or the compensation of  
23 any other Co-conspirator's employees. Intel also objects to this interrogatory as overbroad,  
24 unduly burdensome, and oppressive because the effects, if any, of the alleged "agreements"  
25 would differ for each affected employee, and therefore are beyond the scope of any individual's  
26 knowledge. Intel further objects to this request as vague and ambiguous based upon its use of  
27 the phrase "substantial knowledge." Intel further objects to this interrogatory as premature to the  
28 extent that it is properly the subject of expert testimony. Subject to and without waiving the  
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1 foregoing objections, Intel responds that certain employees identified in these responses have  
 2 knowledge of the expected effects on compensation of the alleged conduct.

3 **INTERROGATORY NO. 13:**

4 In order of corporate seniority, identify your employees who participated in discussions  
 5 with any antitrust regulatory authority regarding agreements or discussions about agreements.

6 **RESPONSE TO INTERROGATORY NO. 13:**

7 In addition to its General Objections, Intel objects to this interrogatory to the extent it  
 8 assumes the existence of “agreements” between Intel and any other defendant. Intel further  
 9 objects to the phrase “in order of corporate seniority,” to the extent that it is vague, ambiguous  
 10 and unintelligible, including because “corporate seniority” is not subject to precise ranking and  
 11 may change over time. Subject to and without waiving the foregoing objections, Intel responds  
 12 as follows:

Employee	Employer	State of Primary Residence	Job Titles (years)
Diane Bryant	Intel Corp.	CA	Design Manager, Server Platform Group (2004-2005) Vice President & General Manager, Server Platform Group (2005-2008) Corporate Vice President, Chief Information Officer (2008-Present)

13 Ms. Bryant should be contacted through Intel counsel only.

14 **INTERROGATORY NO. 14:**

15 Of the persons identified in response to Interrogatory No. 13 above, identify all persons  
 16 who have substantial knowledge of discussions with any antitrust regulatory authority regarding  
 17 agreements or discussions about agreements.

18 **RESPONSE TO INTERROGATORY NO. 14:**

19 In addition to its General Objections, Intel objects to this interrogatory to the extent it  
 20 assumes the existence of “agreements” between Intel and any other defendant. Intel also objects  
 21 to this interrogatory as vague, ambiguous and unintelligible based upon its use of the phrase  
 22 “substantial knowledge.” Subject to and without waiving the foregoing objections, Intel refers to  
 23 its response to Interrogatory No. 13.

1 DATED: March 2, 2012  
2

3 BINGHAM McCUTCHEN LLP  
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5 By: \_\_\_\_\_ /s/  
6 Frank M. Hinman  
7 Attorneys for Defendant  
Intel Corporation  
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**PROOF OF SERVICE**

I am over eighteen years of age, not a party in this action, and employed in San Francisco County, California at Three Embarcadero Center, San Francisco, California 94111-4067. I am readily familiar with Bingham's practice for collection and processing of documents for service via e-mail, and that practice is that the documents are attached to an e-mail and sent to the recipient's e-mail account the same day as the date listed on this proof of service.

Today I served the following document:

**INTEL'S OBJECTIONS AND RESPONSES TO PLAINTIFFS' FIRST SET OF INTERROGATORIES RE: IDENTIFICATION OF WITNESSES**

(BY ELECTRONIC MAIL) by transmitting via electronic mail document(s) in portable document format (PDF) listed below to the email address set forth below on this date.

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1 I declare that I am a member of the bar of this court and directed the service  
2 above and that this declaration was executed on March 2, 2012 at San Francisco, California.

3 \_\_\_\_\_/s/  
4 Sujal J. Shah

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